

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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HERTZ GLOBAL HOLDINGS, INC.,	:	
	:	Case No. 1:19-cv-06957 (AJN)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
NATIONAL UNION FIRE INSURANCE	:	
COMPANY OF PITTSBURGH and U.S.	:	
SPECIALTY INSURANCE COMPANY,	:	
	:	
	:	
Defendants.	:	
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**DEFENDANTS' NOTICE OF MOTION TO  
DISMISS THE SECOND AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that Defendants National Union Fire Insurance Company of Pittsburgh, Pa. ("National Union") and U.S. Specialty Insurance Company ("U.S. Specialty") (together, "Defendants") by and through their undersigned counsel, shall move to dismiss Plaintiff's Second Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) in the above-captioned matter before the Honorable Alison J. Nathan, United States District Judge, on a date and time to be determined by the Court, at the United States Courthouse for the Southern District of New York, 40 Foley Square, Courtroom 906, New York, New York 10007.

The motion, dated June 18, 2020, and all other papers and exhibits accompanying the motion for which this Notice is subject are: (1) Defendants' Memorandum of Law in Support of their Motion to Dismiss the Second Amended Complaint; and (2) Declaration of Alexander S. Lorenzo in Support of Defendants' Motion to Dismiss the Second Amended Complaint, and Exhibits A through G, annexed thereto.

Defendants bring this motion to dismiss under Federal Rules of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted.

Dated: June 18, 2020

**ALSTON & BIRD LLP**

/s/ Alexander S. Lorenzo

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